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7 *Falk Oral and Facial Surgery PLLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 FALK ORAL AND FACIAL SURGERY
11 PLLC d/b/a CANYON ORAL AND FACIAL
12 SURGERY, a Nevada professional limited
13 liability company,

14 Plaintiff,

15 v.

16 SUDHEER J. SURPURE, MD, DDS, INC.
17 d/b/a GRAND CANYON ORAL & FACIAL
18 SURGERY, a Nevada corporation,

Defendant.

Case No.: 2:21-cv-1464-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND (1) PLAINTIFF'S DEADLINE
TO FILE RESPONSIVE PLEADING,
AND (2) PARTIES' DEADLINE TO
FILE PROPOSED DISCOVERY PLAN
AND PROPOSED SCHEDULING
ORDER**

[FIRST REQUEST]

18 Pursuant to LR IA 6-1, Plaintiff Falk Oral and Facial Surgery PLL d/b/a Canyon Oral and
19 Facial Surgery ("Plaintiff") and Defendant Sudheer J. Surpure, MD, DDS, Inc., d/b/a Grand
20 Canyon Oral & Facial Surgery ("Defendant", together with Plaintiff "Parties") submit the
21 following Stipulation to Extend Time to file (1) Plaintiff's Responsive Pleading up to and
22 including October 25, 2021, and (2) Parties' Proposed Discovery Plan and Proposed Scheduling
23 Order. In support of the Stipulation, the Parties state the following:

- 24 1. Plaintiff's responsive pleading is currently due September 24, 2021.
- 25 2. The Parties engaged in the Rule 26(f) conference on September 15, 2021. Their
- 26 Joint Proposed Discovery Plan and Scheduling Order is currently due September
- 27 29, 2021.

1 2. The Parties are in active settlement discussions and thus wish to extend upcoming
2 deadlines.

3 3. This is the first request to extend the deadline for Plaintiff to file its responsive
4 pleading, and for the Parties to file their Joint Proposed Discovery Plan and Scheduling Order.

5 4. This request for an extension of time is not intended to cause any undue delay or
6 prejudice any party.

7 5. Therefore, the Parties hereby stipulate that the deadline for Plaintiff to file its
8 responsive pleading shall be extended to October 25, 2021.

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6. The Parties further stipulate that the deadline for the Parties to file their Joint Proposed Discovery Plan and Scheduling Order shall be extended to October 29, 2021.

WEIDE & MILLER, LTD.

MILLIGAN LAWLESS, P.C.

/s/ F. Christopher Austin

/s/ Robert J. Itri

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Attorney for Defendant

Attorneys for Plaintiff

Dated September 24, 2021

Dated September 24, 2021

SKLAR WILLIAMS PLLC

/s/ Nadia Janjua Ahmed

Nadia Janjua Ahmed (NSB # 15489)
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Attorney for Defendant

Dated September 24, 2021

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: September 28, 2021